

Corporate Environmental Technology  
Environmental Testing Laboratory

ciba

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RIVER MODELING QA/PP  
FOR CIBA LAB

March 17, 1994

APPROVED  
SEE 3-25-94 LTR

Mr. Frank Battaglia  
United States Environmental Protection Agency  
JFK Federal Building  
Boston, MA 02203

RE: Ciba-Geigy Cranston, Rhode Island Investigation

Dear Sir:

This letter is in response to your March 8, 1994 letter to Diane Leber with regard to sampling and analytical activities at the Ciba-Geigy Cranston, RI facility. I had submitted a revised Quality Assurance Plan for Ciba's internal laboratory (Appendix G, Environmental Testing Laboratory), in an effort to obtain approval to perform additional analyses (volatiles and semivolatiles) for the river modeling event. I would like to take this opportunity to thank you for your prompt review and response since the sampling for this event is scheduled to occur within a few weeks.

As we discussed on the phone, I am responding to the seventeen items of your March 8 letter, providing explanation or reference to corrected sections of the attached laboratory QA plan.

1. There are no TCLP analytical tasks associated with this project. I have indicated this in Section 3 of the QA plan.
2. Information has been provided in Section 5, Page 5-3 on the mechanism for generating recovery and RPD ranges for analytes listed in Table 5.1.
3. Those typographical errors found in Table 5.3, Page 5-5, have been corrected in accordance with your suggestions.
4. The source of laboratory pure water has been described in Section 6, Page 6-1.
5. With regard to the preservation of samples intended for analysis of volatile organics, Table 6.1, Page 6-2 has been changed to require that a pH of  $\leq 2$  be verified. Additionally, I contacted Mark Houlday and Ed Hastings at Woodward-Clyde to communicate this concern. They indicated that typically, sample containers are received with HCl already in them. However, checks of pH adjustment are performed in the field and the preservative is found to be adequate. Laboratories typically will sacrifice a vial from a set for a pH and temperature check and record this information.
6. For consistency within the document, I have deleted reference to SW-846 Methods 8080, 8141, and 8150.




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7. The title of Table 9.5 was changed to correctly read Table 9.8.
8. The recovery range for dibromofluoromethane was corrected to read 86-118 in accordance with the method.
9. The title of Table 9.3 was changed to correctly read Table 9.6.
10. On Page 9-9, the report limits for soil were originally provided as five times higher than the water values because it was anticipated that one gram of soil would be used in the analysis. The table has been adjusted to reflect a five gram sample aliquot.
11. Page 11-2 has been amended to indicate that blank correction will not be applied to any analysis.
12. Surrogate recovery limits are typically those that appear in methods where this is the case. The laboratory's LIMS is able to generate charts using the most recent data points. The acceptance limits for recoveries are  $\pm$  three standard deviation units about the mean recovery. I have included examples for Methods 8260 and 8270.
13. Page 11-3 has been amended to indicate that repeated similar excursions of recovery and RPD data indicate a sample matrix interference is affecting the results.
14. Retention times and areas of internal standards are printed out daily, per instrument for inclusion in data packages. Excursions for other warrant troubleshooting and reanalysis of affected samples.
15. The term "EQL" has been replaced by "Reporting Limit" in Section 9. The method detection limits are generated in accordance with Appendix B, 40 CFR 136 and remain in the tables. EQL is not the correct term as you have indicated.
16. The reporting limits listed in the tables in Section 9 meet the requirements of the river modeling for the selected analytes, chlorobenzene, and toluene. Naphthalene and Tinuvin-328 requirements (10 ppb and 150 ppb, respectfully) can be achieved by employing the method detection limit value, since "Reporting Limits" are conservative and rounded.
17. For these analyses (SW-846 Method 8260 and 8270), the acceptance criteria referred to are those that are provided in the methods

I hope these responses are adequate. If you have any further questions, please call me at 908-914-2504.

Respectfully,



John Rissel, Manager  
Analytical Technology

dm  
Enclosure

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